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Attorneys for Plaintiffs and the Proposed Classes

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DANIEL ROSENBAUM, *et al.*,

Plaintiffs,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00103-GMN-MDC

**DECLARATION OF PATRICK J.
COUGHLIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR RECUSAL OF
THE HONORABLE JUDGE GLORIA M.
NAVARRO**

ANDREW CAPLEN INSTALLATIONS,
LLC, *et al.*,

Plaintiffs,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00150-GMN-MDC

THESE PAWS WERE MADE FOR
WALKIN' LLC, on behalf of itself and all
others similarly situated,

Plaintiffs,

v.

PERMIAN RESOURCES CORP., *et al.*,

CASE NO. 2:24-cv-00164-GMN-MDC

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Defendants.

JOHN MELLOR, on behalf of himself and
all others similarly situated,

Plaintiff,

v .

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-CV-00253-GMN-MDC

BRIAN COURTMANCHE, *et al.*,

Plaintiff,

v .

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00198-GMN-MDC

LAURIE OLSEN SANTILLO, on behalf of
herself and all others similarly situated,

Plaintiff,

v .

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00279-GMN-MDC

RICHARD BEAUMONT, on behalf of
himself and all others similarly situated,

Plaintiff,

v .

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00298-GMN-MDC

1 BARBARA AND PHILLIP
2 MACDOWELL, individually and on behalf
of all others similarly situated,

3 Plaintiffs,

4 v .

5 PERMIAN RESOURCES CORP., *et al.*,

6 Defendants.

CASE NO. 2:24-cv-00325-GMN-MDC

7 WESTERN CAB COMPANY, individually
8 and on behalf of all others similarly situated,

9 Plaintiffs,

10 v .

11 PERMIAN RESOURCES CORP., *et al.*,

12 Defendants.

CASE NO. 2:24-cv-00401-GMN-MDC

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1 I, Patrick J. Coughlin, hereby declare as follows:

2 1. I am an attorney with the law firm of Scott+Scott Attorneys at Law LLP, counsel for Daniel
3 Rosenbaum, Reneldo Rodriguez, and Thomas Caron in the above-referenced action. I submit this
4 affidavit in support of Plaintiffs' Motion for Recusal of the Honorable Judge Gloria M.
5 Navarro. I have personal knowledge of the matters stated herein, and if called upon, I could, and
6 would, competently testify thereto.

7 2. To the best of my knowledge and belief, attached hereto is a true and correct copy of each
8 of the following documents:

9 3. **Exhibit 1** is the "AGREEMENT AND PLAN OF MERGER dated as of October 10, 2023
10 by and among PIONEER NATURAL RESOURCES COMPANY, EXXON MOBIL
11 CORPORATION, and SPQR, LLC" filed with the U.S. Securities and Exchange Commission as
12 Exhibit 2.1 of Exxon Mobil Corporation's 2023 Form 10-K for the fiscal year ended December 31,
13 2023, Commission File Number 1-2256, filed February 28, 2024.

14 4. **Exhibit 2** is a March 6, 2024 article entitled "Exxon reiterates it sees Q2 close for Pioneer
15 Natural Resources deal," published on the Seeking Alpha webpage by Joshua Fineman at the
16 following URL: [https://seekingalpha.com/news/4076720-exxon-reiterates-it-sees-q2-close-for-](https://seekingalpha.com/news/4076720-exxon-reiterates-it-sees-q2-close-for-pioneer-natural-resources-deal)
17 [pioneer-natural-resources-deal](https://seekingalpha.com/news/4076720-exxon-reiterates-it-sees-q2-close-for-pioneer-natural-resources-deal) (PDF version created March 18, 2024).

18 5. **Exhibit 3** is a February 7, 2024 press release entitled "Pioneer Natural Resources
19 Announces Results of Special Meeting," published on the Pioneer Natural Resources webpage at
20 the following URL: [https://investors.pxd.com/investors/news-releases/news-details/2024/Pioneer-](https://investors.pxd.com/investors/news-releases/news-details/2024/Pioneer-Natural-Resources-Announces-Results-of-Special-Meeting/default.aspx)
21 [Natural-Resources-Announces-Results-of-Special-Meeting/default.aspx](https://investors.pxd.com/investors/news-releases/news-details/2024/Pioneer-Natural-Resources-Announces-Results-of-Special-Meeting/default.aspx) (PDF version created
22 March 18, 2024).

23 6. **Exhibit 4** is an October 11, 2023 press release entitled "ExxonMobil announces merger
24 with Pioneer Natural Resources in an all-stock transaction," published on the ExxonMobil webpage
25 at the following URL: [https://corporate.exxonmobil.com/news/news-releases/2023/1011_exxo](https://corporate.exxonmobil.com/news/news-releases/2023/1011_exxonmobil-announces-merger-with-pioneer-natural-resources-in-an-all-stock-transaction)
26 [nmobil-announces-merger-with-pioneer-natural-resources-in-an-all-stock-transaction](https://corporate.exxonmobil.com/news/news-releases/2023/1011_exxonmobil-announces-merger-with-pioneer-natural-resources-in-an-all-stock-transaction) (PDF
27 version created March 18, 2024).
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1 7. **Exhibit 5** is excerpted pages 1-3, 66, and 119 from Exxon Mobil Corporation’s 2023 Form
2 10-K for the fiscal year ended December 31, 2023, Commission File Number 1-2256, filed with
3 the Securities and Exchange Commission on February 28, 2024.

4 8. **Exhibit 6** is a January 16, 2024 article entitled “Drivers sue US shale oil producers over
5 alleged price-fixing scheme,” published on the Reuters webpage by Mike Scarcella at the following
6 URL: [https://www.reuters.com/legal/litigation/drivers-sue-us-shale-oil-producers-over-alleged-](https://www.reuters.com/legal/litigation/drivers-sue-us-shale-oil-producers-over-alleged-price-fixing-scheme-2024-01-16/)
7 [price-fixing-scheme-2024-01-16/](https://www.reuters.com/legal/litigation/drivers-sue-us-shale-oil-producers-over-alleged-price-fixing-scheme-2024-01-16/) (PDF version created on March 18, 2024).

8 I declare under penalty of perjury that the foregoing is true and correct.

9 DATE: March 19, 2024

/s/Patrick J. Coughlin

Patrick J. Coughlin